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IN CLERKS OFFICE

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS 16 SEP 16 PM 2:58

UNITED STATES OF AMERICA

) U.S. DISTRICT COURT
Criminal No. DISTRICT OF MASS.
)

V.

ROBIN CALEF,

Defendant

21-cr-10281

Violation:

Violation:

33

) Count One: Theft of Government Money
) (18 U.S.C. § 641)

)

-) Forfeiture Allegation:
-) (18 U.S.C. § 981(a)(1)(C) and
-) 28 U.S.C. § 2461)

INFORMATION

COUNT ONE

Theft of Government Money (18 U.S.C. § 641)

The United States Attorney charges:

From on or about December 1, 2006 until on or about September 20, 2017, in the District of Massachusetts, the defendant,

ROBIN CALEF,

did, on a recurring basis, knowingly and willfully embezzle, steal, purloin, and convert to her use and the use of another, any money and thing of value of the United States and of any department and agency thereof, namely, the U.S. Department of Veterans Affairs, a department within the executive branch of the U.S. Government, in a total amount greater than \$1,000, namely, Veterans Affairs funds, having a value of approximately \$102,289.62.

All in violation of Title 18, United States Code, Section 641.

FORFEITURE ALLEGATION

(18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c))

The United States Attorney further alleges:

1. Upon conviction of the offense in violation of Title 18, United States Code, Section 641, set forth in Count One, the defendant,

ROBIN CALEF,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense. The property to be forfeited includes, but is not limited to, the following:

a. \$102,289.62, to be entered in the form of a forfeiture money judgment.

2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), as a result of any act or omission of the defendant --

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 1 above.

All pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

Respectfully submitted,

NATHANIEL R. MENDELL
Acting United States Attorney

By: *Suzanne Sullivan Jacobus*
SUZANNE SULLIVAN JACOBUS
Assistant United States Attorney

Dated: 9-16-21